

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NORTH CHINA SHIPPING CO., LTD., :
: **ECF**
Plaintiff, : **SUPPLEMENTAL**
: **AFFIDAVIT PURSUANT**
-against- : **TO SUPPLEMENTAL**
: **RULE B**
GUANGXI WANXIN INTERNATIONAL : **07 Civ. 439 (PKL)**
TRADING CO., LTD. and UNION :
MINERALS LTD., :
:
Defendants. :
-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JAMES P. RAU, being duly sworn, deposes and
says:

1. I am a member of the Bar of this Court and a member of the firm of Cardillo & Corbett, attorneys for the Plaintiff herein. I am familiar with the facts of this case and make this affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. I have attempted to locate defendants, GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD. and UNION MINERALS LTD. within this District. As part of my investigation to locate the Defendants within this District, I examined the telephone

company information directory, as well as the white and yellow pages of New York listed on the Internet or World Wide Web, and did not find any listing for the Defendants.

3. The database of the office of the New York State Secretary of State was searched to determine if Defendant is qualified to do business in New York, without result.

4. On information and belief, Defendant, GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD., was, and still is, a foreign corporation, or other business entity, organized under, and existing by virtue of foreign law, with an address at 12/F, Tian Ma Bldg., Port District, Fangcheng City, Guangxi, China.

5. On information and belief, Defendant, UNION MINERALS LTD., was, and still is, a foreign business entity organized and existing under the laws of a foreign country with an address at 2001-4, 20-F, Hang Seng Building, 77 Des Voeux Hoau, Central, Hong Kong.

6. In consequence of these inquiries your deponent believes that the Defendants cannot be found within the Southern District of New York.

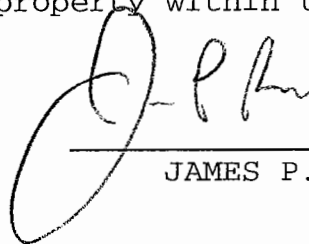
7. Upon information and belief, Defendants have, or will have during the pendency of this action, tangible and intangible property within the District in the hands of ABN Amro Bank NV, American Express Bank, Bank of America, Bank of Communications Co. Ltd. New York Branch, Bank of New York,

Barclays Bank, BNP Paribas, Citibank, Deutsche Bank, HSBC (USA) Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or Wachovia Bank, in the form of accounts and/or fund transfers identified as follows:

- a) accounts in the name of GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD., and/or UNION MINERALS LTD., or
- b) electronic funds transfers listing GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD., and/or UNION MINERALS LTD. as a beneficiary of the funds transfer, or
- c) electronic funds transfers showing GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD., and/or UNION MINERALS LTD. as the remitting party or ordering customer.

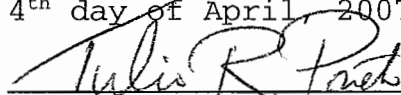
WHEREFORE, NORTH CHINA SHIPPING CO., LTD.

respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of GUANGXI WANXIN INTERNATIONAL TRADING CO., LTD. and UNION MINERALS LTD.'s tangible and intangible property within this District.



JAMES P. RAU

Sworn to before me this
4th day of April, 2007



NOTARY PUBLIC

TULIO R. PRIETO
Notary Public, State of New York
No. 02PRS070011
Qualified in Richmond County
Certificate Filed in New York County
Commission Expires February 19, 2010